

To the Honorable Commissioners of the FCC,

I am writing to you today to comment on Docket No. 02-277, The Biennial Review of the FCC's broadcast media ownership rules. I am voicing my support to retain all the FCC rules in question. These rules set limits on concentration of the broadcast industry and serve the public interest by preserving diversity of ownership in the broadcast marketplace. These rules are; The Television-Radio Cross-Ownership Rule, The Broadcast-Newspaper Cross Ownership Ban, The National Television Ownership Rule, The Duopoly Rule for Radio, The Local Television Ownership Rule, and The Dual Network Rule.

The great privilege to carry on an informed debate and a discussion of current events, both locally and globally, is part of the founding philosophy of this country. If the avenues for sharing information are restricted to very few, then the quality of the information presented will decay and be no better than another form of entertainment. And more importantly, what is the value of varied information sources when they are controlled by a single voice?

As a creator of independent media and a media activist here in San Francisco, my experience tells me that the current ownership and concentration of print and electronic media (radio and TV) have already diminished freedom of expression and the vital importance of gaining access to those media. The ability to say things that are potentially challenging to audiences at large, or possibly critical of society's special interests, lies at the heart of the independent media maker's business. Already it is difficult to work outside the established system here in San Francisco. If the channels to a potential audience - be they cable programming channels, local television stations, or even newspapers that promote and review independent works - fall into the hands of even fewer corporate owners, sharing my work or the work of any independent artist will become much harder.

In such an environment, the concentrated commercial interest inevitably compromises the public interest. The FCC has rules limiting ownership to preserve the ecology of a healthy marketplace of ideas. If the FCC undermines this ecology by removing the rules, it undermines the future health of the marketplace of information.

Congress and the Supreme Court have long recognized that a functioning democracy depends on a media open to independent and unconventional news and a varied entertainment media. Media makers working outside the corporate environment continually provide content that is so defined. This unconventionality and variety that stimulates the American people both causes us to constantly question the status quo, and facilitates the ability of Americans to speak with one another. If we exist in an environment in which our news outlets have merged together, both print and broadcast, our ability to open informed discussion is restricted.

I urge you to rule in the public interest on this matter. The public interest will be served by preserving the FCC's Broadcast Media ownership rules.

Those are my comments on Docket No. 02-277.

I also urge you to reconsider two particular conditions of the LPFM initiative. I would strongly suggest that you drop the Third Adjacent Channel provision, and that you make LPFM broadcast licenses available to so-called 'pirate operations', that is to say, stations that were on the air prior to the FCC's LPFM initiative.

I look forward to your reply.

Thank you,

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